

December 1, 2015

[REDACTED]
[REDACTED]
[REDACTED]

re: Vista Pop Warner

[REDACTED]

This letter is meant to give you formal written notice that this office has been retained to represent Vista Pop Warner against you in any civil actions arising from your theft of money, records, and other property from VPW.

Please direct all future communications concerning the above to this office.

At this point, there is substantial reason to believe that you, and potentially others, have misappropriated property and money belonging to VPW well in excess of \$20,000.00. *On behalf of VPW, I hereby demand the complete and immediate return of all money stolen by you or others in association with you, no matter the form in which it was taken.* (i.e., check, electronic transfer, cash not deposited, etc.)

In addition to money, you are currently in possession of a number of items which belong to VPW, and I am further requesting that these items be returned immediately as well. Those items include:

- 1) Access to the VPW Square account;
- 2) Any statement or account information for Square since the VPW account was opened;
- 3) Access to the VPW Quickbooks;
- 4) Any statement or account information pertaining to PayPal since the VPW account was opened;
- 5) Any records, whether handwritten or electronic regarding any VPW accounts payable or receivable;
- 6) Any handwritten logs, notes, receipts or registers pertaining to money collected for VPW;

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- 7) All outgoing and incoming correspondence from the email addresses, [REDACTED] and [REDACTED] pertaining to VPW business or participants, or pertaining to the location of money misappropriated from VPW;
- 8) 2015 US Bank Check registers;
- 9) Bank statements for account ending 3645 for all of 2014 and 2015;
- 10) Bank statements for account ending 9709 for all of 2014 and 2015;
- 11) Bank statements for account ending 3343 for all of 2014 and 2015;
- 12) All electronically saved documents relating to VPW accounts;
- 13) All electronically saved documents relating to where the misappropriated money was sent;
- 14) any handwritten accounting books, papers, receipts or information.

At this point, I have advised the Board of VPW that they have a number of potential civil remedies against you. They could sue you in civil court. Based on the evidence I have already seen, I have no doubt that they would prevail, and obtain a judgement against you including all stolen monies, attorney's fees, court costs, and likely punitive damages. Thereafter, they could undertake all legally necessary means to collect that judgement from you, including seizing accounts and property belonging to you or garnishing your paycheck.

They have a number of other options, including contacting the press, which, in my experience, finds the "she stole from the kids" story very compelling. (You may want to Google "Tina Tuttle Pop Warner theft" for a point of reference) They could report your conduct to your employer, or the state licensing agency which sanctions your occupation.

These are all distinct from the criminal aspect of your conduct. And, while each has a certain visceral appeal, they do the boys and girls of VPW no service whatsoever. As you may or may not be aware, the Pee Wee Panthers travel this weekend to a bowl game in Las Vegas and the Midget Cheerleaders are headed to Florida for a national competition. Thus, helping these deserving children is a higher priority than punishing you, and anyone who may have been working with you.

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In that light, the Board has agreed that, should you return the money, in full, on or before Friday, December 4, 2015 at noon, by cash or cashier's check, and the rest of the property by the December 14, 2015, they will not pursue any civil legal action against you.

Please let me know at your earliest convenience how you wish to proceed.

Sincerely,

Kenneth R. Elliott
Attorney at Law

cc: Vista Pop Warner Board